

Superior Court of the State of California  
For the County of Los Angeles

CHURCH OF SCIENTOLOGY OF  
CALIFORNIA,

Plaintiff,

vs.

GERALD ARMSTRONG, DOES 1  
through 10, inclusive,

Defendants,

No. C 420 153

MARY SUE HUBBARD,

Intervenor.

DEPOSITION OF GERALD ARMSTRONG

Woodland Hills, California

January 14, 1983

**COPY**

Sylvia Becker & Associates  
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1 Q And one other question that I forgot to ask you.  
2 What was the size of the staff of people working on film produc-  
3 tion matters? I'm going back now to before you went into the  
4 RPF.

5 A 150.

6 Q What were your functions working on LRH  
7 Renovations?

8 A I was in charge of purchasing material for the  
9 renovations and decorations of a home for Mr. Hubbard and  
10 several offices on the Gilman Hot Springs property for him, and  
11 then I was in charge of all the renovations and the Household  
12 Unit at Gilman Hot Springs.

13 Q You were in charge of the Household Unit?

14 A Yes.

15 Q When was that?

16 A 1979.

17 Q Was that a different position than the position  
18 working on LRH Renovations?

19 A Yes.

20 Q When were you assigned to that position?

21 A Oh, it would be in the fall, summer or fall of  
22 1979.

23 Q Didn't hold any positions between LRH Renovations  
24 and the Household Unit?

25 A I don't believe so.

26 Q While you held the position in LRH Renovations,  
27 who did you report to?

28 A To Lola Rossouw or Laurel Sullivan.

1 A Yes.

2 Q What were those designations?

3 A LRH External Comm Aide.

4 Q C-o-m-m --

5 A Aide. I suppose the CO HU and DCO HU.

6 Q Well, during the period of time that you were in  
7 the DCO HU, you had contact with Mr. Hubbard on a couple of  
8 occasions where you said hello; right?

9 A Yes.

10 Q I'm not talking about that kind of thing. I'm  
11 talking about people who would work with him on a regular basis  
12 where he would have face-to-face contact with them and give  
13 them various assignments; okay?

14 A CO HU, DCO HU, External Comm Aide.

15 Whoever was in charge of his finances, that sort  
16 of thing.

17 Q Is it your testimony that DCO HU had the kind of  
18 relationship that I defined before with Mr. Hubbard?

19 A Yes.

20 Q But not while you were on that post?

21 A I was on that post at SU. If I had been on that  
22 post where he was, then it would be a different thing. If  
23 there was a DCO HU where he was, then I would consider that  
24 person an aide, and I do consider that person an aide.

25 Q When you say where he was, are you referring to  
26 the property that you heard about in Hemet?

27 A Yes.

28 Q Who else would fit that category? What other

1 designations?

2 A That's all I can think of right now.

3 Q What about within the Guardian Office structure?  
4 Would you classify any people within that structure as being  
5 personal aides of Mr. Hubbard?

6 A Certainly Mary Sue Hubbard was.

7 Q Anybody else?

8 A I don't believe so.

9 Q Now, you stated that in early 1981, January or  
10 February I guess, you got assigned to senior Pers PRO Secretary;  
11 is that the right designation?

12 A Researcher.

13 Q Researcher.

14 A Okay.

15 Q Tell me how you came to be in that position.

16 A I petitioned L. Ron Hubbard.

17 Q What form did that petition take?

18 A I wrote to him.

19 Q And what did you do with what you had written?

20 A I put it in an out basket and it went to him.

21 Q Where was your out basket?

22 A I believe the out basket that I used was in the  
23 carpenter shop.

24 Q And somebody picked it up at some point?

25 A Yes.

26 Q Do you know who?

27 A No.

28 Q Do you know what happened to it after that?

1           A       No.

2           Q       At some point did you get a response to this  
3 petition?

4           A       Yes.

5           Q       What form did this response take?

6           A       It was a typed response.

7           Q       What did it say?

8           A       It said that my petition is approved. I seem to  
9 recall that it said something about in addition to what I've  
10 laid out there was documents found, there are other things,  
11 there are other sources of material around.

12                   MR. STECHEL: The Church moves to strike for purposes  
13 of trial the testimony of the witness regarding the contents  
14 of the alleged document he's talking about on the basis of the  
15 best evidence rule.

16 BY MR. LITT:

17           Q       Was the petition hand signed by Mr. Hubbard --  
18 I'm sorry -- this response that you have described?

19           A       No.

20           Q       The petition that you sent him, did it have a  
21 place at the bottom of it for a signature, approved or  
22 disapproved?

23           A       I believe so, yes.

24           Q       Did you ever get back anything that had a  
25 signature of Mr. Hubbard next to either the approved or  
26 disapproved line?

27           A       Yes.

28           Q       And what did it have on it?

1 A It had LRH.

2 Q Next to the approved line? Next to the approved  
3 line?

4 A Go back to your question.

5 Q My question: did you get back --

6 A Did you say did I ever get anything back?

7 Q I'm referring now to the petition.

8 A Okay. I thought you said did I ever get anything  
9 back.

10 Q No, it was specific to the petition.

11 A All right. So, no.

12 Q And the response that you received to your  
13 petition, how was the salutation at the end? What form did it  
14 take?

15 A LR.

16 Q Which you took to mean "Love, Ron"?

17 A Yes.

18 Q And did this response indicate to you that you  
19 were responsible in carrying out your staff functions to report  
20 to anybody? In other words, you said that at some point you  
21 got back a response to this petition which said you could  
22 assume this post. Was there any indication who you were to  
23 report to or anything like that?

24 A I don't recall that.

25 Q Well, was there someone that, in carrying out  
26 this position, you in fact reported to?

27 A Yes.

28 Q Who was that?

1           A       Laurel Sullivan.

2           Q       What was her position at the time?

3           A       She was the senior LRH Personal Public Relations  
4 Officer.

5           Q       And during this period of time, were you still  
6 living in Gilman Hot Springs?

7           A       Yes.

8           Q       Did you receive any other responses to this  
9 petition other than the one you have just described?

10          A       No.

11          Q       And what is your understanding of what your job  
12 function was in assuming this position?

13          A       I was to assemble documentation for a biography  
14 to be written about L. Ron Hubbard.

15          Q       Who was writing the biography?

16          A       We did not have a writer.

17          Q       Well, were you aware of the existence of some plan  
18 to try to obtain a writer?

19          A       Yes.

20          Q       How did you become aware of that?

21          A       I knew about that in conversations with Laurel  
22 Sullivan.

23          Q       And in the petition what were your reasons for  
24 suggesting that you be assigned to this post?

25          A       It was an area in which I had a lot of interest.  
26 I felt that I was fairly good at research-type activities. I  
27 had already put in about nine years of service. That's about  
28 it.

1 Q And I take it that you felt that you could assist  
2 in bringing about this biographical project by your participa-  
3 tion?

4 A Yes.

5 Q And also assist in gathering various materials  
6 to be displayed concerning Mr. Hubbard's life and work?

7 A Yes.

8 Q And were you enthusiastic about the project at  
9 the time?

10 A Yes.

11 Q Did you feel that it would be of value to  
12 Scientology and to Mr. Hubbard's work at the time?

13 A Yes.

14 Q Were there various people that you copied in on  
15 your petition?

16 A Yes.

17 Q Do you remember who or what posts?

18 A I believe they were principally those people who  
19 were my seniors at that time -- DCO HU, CO HU, Pers PRO. There  
20 may have been more.

21 Q And would it be fair to say that you were, as you  
22 understand it, assigned to this post in order to help to  
23 develop Scientology and Mr. Hubbard's work?

24 A Yes.

25 Q That was your understanding? In fact that was  
26 your intention; right?

27 A Yeah.

28 Q You would not have been assigned to this post if



1 you were not a Scientologist; correct?

2 A I can't say that.

3 Q Give me your opinion based on your experience.

4 A (No response.)

5 Q You can't give an opinion?

6 A No. I think that any outsider could have done  
7 it just as well.

8 Q No. I'm not asking whether you could have per-  
9 formed it. I'm asking whether you would have been assigned  
10 to it.

11 A I don't know.

12 Q Well, let me ask you a question: do you know of  
13 anybody who was ever assigned to a position within the  
14 Scientology structure that was not a Scientologist?

15 A Omar Garrison who's writing the book.

16 Q No, no, no. Do you have any information that  
17 Omar Garrison was assigned to a Scientology post?

18 A Oh, if it were a Scientology post, then it would  
19 have to be a Scientologist.

20 Q Well, this was a Scientology post, wasn't it?

21 A It was a brand new thing.

22 Q Did you consider it a Scientology post?

23 A Yes. But it need not have been. That's all I'm  
24 saying.

25 Q Mr. Armstrong, answer my question. As I told you  
26 before, your lawyer will have an opportunity to ask you what-  
27 ever she wants at the time.

28 You considered it a Scientology post; is that

1 correct?

2 A Yes.

3 Q You petitioned for it on the basis of your  
4 experience of what procedure one would go through to try to  
5 get assigned within the Scientology structure to such a post;  
6 is that correct?

7 A Yes.

8 Q And in all the years you were in Scientology, you  
9 never observed anyone who was not a Scientologist get assigned  
10 to a Scientology post; correct?

11 A Correct.

12 MR. STECHEL: The Church wants to strike the portion of  
13 the answer of the witness where he said, "It need not have to  
14 be," everything after the statement that he considered it to  
15 be a Scientology post, the phraseology after that "but it need  
16 not have been," those words the Church moves to strike on the  
17 grounds that it is not responsive to the question that was  
18 asked at that time; and in view of the subsequent answers of  
19 the witness, it is also speculation and a sham.

20 BY MR. LITT:

21 Q You were transferred from one position within the  
22 Scientology structure to another position within the  
23 Scientology structure after your petition was granted; is that  
24 correct?

25 A Yes.

26 Q And when you say that your intention was to  
27 develop Scientology, would it be fair to say that what that  
28 means is that things that would be highly critical of

1 Q Was it a single room, or were there other people  
2 also living in that room?

3 A Single room.

4 Q And I believe your testimony was that there were  
5 guards who were responsible to watch you?

6 A Yes.

7 Q Can you tell me who they were?

8 A I don't recall their names. They were B-1  
9 personnel. One of them was from Denver, and the other was, I  
10 believe, from Phoenix or Nevada -- Phoenix or Las Vegas, but  
11 I'm not sure. I know they were both from out of state.

12 Q What about when you were going to do this micro-  
13 filming at the library. Do you remember the guards were with  
14 you then. Were those the same people?

15 A There were three or four who were assigned around  
16 the clock.

17 Q Do you remember any of their names?

18 A I don't remember the names.

19 Q Were the two people that you've just described  
20 among the three or four, or were they different?

21 A No, they were part of the people who were assigned

22 Q Now, tell me about the post, talking now about  
23 the senior Pers PRO Researcher post. After you assumed that  
24 position, what steps did you take to begin to carry it out?

25 A I began to assemble material connected with L. Ron  
26 Hubbard.

27 Q And how did you go about trying to assemble such  
28 material?

1 were on this post?

2 A There was another box of materials which were  
3 sent to me by Carmen Wiese who was assembling Mr. Hubbard's  
4 photographic materials, and this box contained also early  
5 biographical materials which he sent to me.

6 Q Do you know where she got them?

7 A No, I don't.

8 Q Anything else that was sent to you from R  
9 Storage?

10 A Not that I recall.

11 Q What was the total number of boxes removed from  
12 R Storage pursuant to this effort that you have described?

13 A I recall I would say about 21, 22, 23 boxes.

14 Q At some point were these materials removed from  
15 where Miss Sullivan had placed them and taken someplace else?

16 A Yes.

17 Q When was that?

18 A That was -- I believe it would be in late February  
19 of 1980.

20 Q How many boxes were removed at that time?

21 A All of those boxes.

22 Q You had already gone into the R Storage by then?

23 A Yes.

24 Q And where were they removed to?

25 A They were removed to the Cedars Complex.

26 Q Where in the Cedars Complex?

27 A On the first floor.

28 Q Some particular office?

1 A Yes. There was an office on the east side.

2 Q Was it somebody's office? Was it somebody else's  
3 office?

4 A It was Laurel's and my office.

5 Q Did Laurel have offices both at Gilman Hot  
6 Springs and at Cedars?

7 A Yes, she did.

8 Q And were you the person who transported them?

9 A Yes.

10 Q And did you have to go through some procedure  
11 before removing them from Laurel's office at Gilman Hot Springs  
12 and transferring them to Cedars?

13 A No.

14 Q Did you get permission from anyone to do that?

15 A It was ordered by Laurel.

16 Q She initiated the order? You didn't suggest it?

17 A No.

18 Q "No" doesn't -- I'll ask it again. Did you  
19 suggest that this be done?

20 A I don't believe so.

21 Q Did Laurel initiate the idea?

22 A To my recollection, yes.

23 Q And is that where the documents were maintained,  
24 in that office, until the time that you left?

25 A No.

26 Q Were they at some point moved someplace else?

27 A Yes.

28 Q Where?

1           A       I don't recall.

2           Q       Describe the bulk or the amount of materials  
3 that you got on that occasion.

4           A       It was a very small amount. It was like that  
5 (indicating).

6           Q       And when did you next get materials from  
7 Controller Archives?

8           A       It would have been sometime later in the year,  
9 perhaps the October, November period.

10          Q       And describe the circumstances under which you  
11 got those materials.

12          A       Tom Vorm saw me and said that I could go through  
13 the trunks. He made some time. We went there together. We  
14 went through the trunks.

15          Q       Did this just happen spontaneously, or had you  
16 made some inquiries of Mr. Vorm?

17          A       Yes. Yeah, it was something we had been discuss-  
18 ing for a year previously.

19          Q       Do you know how Mr. Vorm went about obtaining  
20 authority for you to take any of these documents?

21          A       No.

22          Q       Do you know what the Controller Archives were,  
23 how they came about?

24          A       Only what I had been told.

25          Q       And who had told you anything about this?

26          A       Mary Sue and -- in dispatches and in discussions  
27 with Mike Smith and Tom Vorm.

28          Q       And you had heard Mary Sue's explanation on

1 Q And you purchased documents or photographs or  
2 memorabilia from various private individuals?

3 A Yes.

4 Q How were these materials paid for?

5 A Cash.

6 Q Where did you get the cash?

7 A Either from Sea Org Reserves or from the CMO.

8 Q And were you gathering up such private materials  
9 throughout this whole period of time of 1980 and 1981?

10 A No.

11 Q When did you begin that?

12 A When I -- whenever I encountered some materials  
13 in the course of my work.

14 Q When did that start?

15 A Mid-1980.

16 Q And did you take some trips in order to go about  
17 purchasing these materials?

18 A I purchased materials on those trips.

19 Q Were you performing other functions as well on  
20 those trips?

21 A Yes.

22 Q What other functions?

23 A Research, biographical research.

24 Q What type of research?

25 A Interviews, going through public records,  
26 geneology study.

27 Q Now, during these years 1980 and 1981, did you  
28 receive any salary of any type while you were carrying out

1 these activities?

2 A I was paid an allowance.

3 Q Standard allowance for a Sea Org member?

4 A Yes.

5 Q You were a Sea Org member; right?

6 A Yes.

7 Q And you were provided room and board?

8 A Yeah.

9 Q And you were provided Scientology services?

10 A Yeah.

11 Q In other words, the normal arrangement for some-  
12 body who was a staff member for a Scientology organization?

13 A Yes.

14 Q At some point was there an agreement reached with  
15 Omar Garrison whereby he was to write an authorized biography?

16 A Yes.

17 Q And how did you find out about that?

18 A I was informed of it.

19 Q Do you know who informed you?

20 A Laurel.

21 Q Do you know about when that was?

22 A I believe it was in October 1980.

23 Q And what were you told about the arrangement  
24 with Mr. Garrison?

25 A That a contract had been signed by him.

26 Q And what was your understanding as to the nature  
27 and terms of that contract?

28 A That he was going to write a biography.



1 capacity of gathering up their private documents? Do you think  
2 you can answer that?

3 A I don't know, but they might.

4 Q Have you ever observed in all of your years of  
5 Scientology a situation in which they ever granted such per-  
6 mission to someone who was hostile to them and to Scientology?

7 MS. DRAGOJEVIC: I don't think -- that totally lacks  
8 foundation. I will object to that question. It assumes facts  
9 not in evidence; it lacks foundation; it is argumentative.

10 MR. LITT: It's not argumentative.

11 MS. DRAGOJEVIC: You haven't established any foundation  
12 with respect to that question.

13 MR. LITT: I don't have to establish a foundation. I'm  
14 asking him whether he ever observed something. He could say  
15 yes, or he could say no. There's no foundation to the ques-  
16 tion.

17 MS. DRAGOJEVIC: I want to hear the question over again,  
18 please, Miss Reporter.

19 (The record was read by the reporter.)

20 THE WITNESS: No.

21 BY MR. LITT:

22 Q Do you have any facts to point you to indicate  
23 that they would do so now?

24 A No.

25 Q Did you testify previously that you considered  
26 these documents to belong to Mr. Hubbard?

27 A At least some of them.

28 Q The bulk of them?

1 A Yes.

2 Q And some others that belong to Mrs. Hubbard?

3 A Yes.

4 Q And perhaps a few that belong to one or another  
5 Scientology organization?

6 A Uh-huh.

7 Q That's still your testimony?

8 A Yes.

9 Q And with respect to those documents that are  
10 either Mr. or Mrs. Hubbard's, would you agree that, based on  
11 your experience with the Hubbards and in Scientology, that  
12 Mrs. Hubbard would have the right to documents of Mr. Hubbard's?

13 MS. DRAGOJEVIC: I'm going to object to that as calling  
14 for speculation.

15 BY MR. LITT:

16 Q Can you answer that question?

17 A I don't believe she would.

18 Q Didn't you tell me earlier that it was only  
19 Mr. or Mrs. Hubbard, either of them or someone acting on their  
20 behalf that would have the right to control these documents?

21 A At least some of them, yes.

22 Q The personal documents of either of them?

23 A Yes.

24 Q I'm not now speaking of documents which would  
25 be the documents of the Church but one or the other of their  
26 documents?

27 A Yes.

28 Q Are you contending that that is no longer the case.